

HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JUSTIN FRANKS,

Plaintiff,

V.

THE NIELSEN COMPANY (US), LLC;
GRACENOTE, INC.; JOHN DOES 1-10,

Defendants.

No. 3:23-cv-06150

**STIPULATED MOTION TO EXTEND
DEFENDANTS' DEADLINE TO FILE
RESPONSIVE PLEADING**

**NOTE ON MOTION CALENDAR:
April 18, 2024**

STIPULATION

The parties to this action, by and through their undersigned counsel, respectfully stipulate to the following: On April 2, 2024, Plaintiff filed his Second Amended Complaint (“SAC”). Pursuant to the Court’s March 29, 2024 Order, Defendants’ responsive pleading deadline is twenty-one days after March 29, 2024, which is April 19, 2024. Defendants require a short extension of time from the April 19 deadline to adequately prepare their response to the SAC. Defendants request a short extension through and including May 3, 2024 for that purpose. Plaintiff does not oppose this stipulation. This stipulation is not for the purpose of delay and will not affect any other deadlines in the case.

STIPULATED MOTION TO EXTEND DEFENDANTS' DEADLINE TO FILE RESPONSIVE PLEADING
Page 1 - 3:23-cv-06150

Page 1 - 3:23-cv-06150

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 SHISHIDO TAREN GOLDSWORTHY
2

3 *s/ Jordan A. Taren (per email authorization)*

4 Jordan A. Taren, WSBA No. 50066
5 705 Second Avenue, Suite 1500
6 Seattle, WA 98104
7 (206) 622-1604 Phone
8 jtaren@shishidotaren.com

9 *s/ Linda D. Friedman (per email authorization)*

10 Linda D. Friedman ((Admitted PHV)
11 STOWELL & FRIEDMAN, LTD.
12 303 W. Madison Street, Suite 2600
13 Chicago, IL 60606
14 (312) 431-0888 Phone
15 (312) 431-0228 Fax
16 lfriedman@sfltd.com

17 *Attorneys for Plaintiff*

18 CORR CRONIN LLP
19

20 *s/ Blake Marks-Dias*

21 Blake Marks-Dias, WSBA No. 28169
22 Victoria E. Ainsworth, WSBA No. 49677
23 1015 Second Avenue, Floor 10
24 Seattle, Washington 98104
25 (206) 625-8600 Phone
26 (206) 625-0900 Fax
27 bmarksdias@corrchronin.com
28 tainsworth@corrchronin.com

29 Cardelle Bratton Spangler, *Admitted Pro
30 Hac Vice*

31 WINSTON & STRAWN LLP
32 35 West Wacker Drive
33 Chicago, IL 60601
34 (312) 558-5600 Phone
35 (312) 558-5700 Fax
36 CSpangler@winston.com

37 Whitney Williams, *Admitted Pro Hac
38 Vice*)

39 WINSTON & STRAWN LLP
40 333 S. Grand Avenue, 38th Floor
41 Los Angeles, CA 90071-1543
42 (213) 615-1700 Phone
43 (213) 615-1750 Fax
44 WhWilliams@winston.com

45 *Attorneys for Defendants*

46 STIPULATED MOTION TO EXTEND DEFENDANTS'
47 DEADLINE TO FILE RESPONSIVE PLEADING
48 Page 2 - 3:23-cv-06150

49 **CORR CRONIN LLP**
50 1015 Second Avenue, Floor 10
51 Seattle, Washington 98104-1001
52 Tel (206) 625-8600
53 Fax (206) 625-0900

ORDER

THIS MATTER having come before the Court on the agreed motion of the parties, the Court GRANTS this unopposed motion to extend the April 19, 2024 responsive pleading deadline to May 3, 2024.

IT IS SO ORDERED.

DATED this 19th day of April, 2024.

Tony Wtr

TIFFANY M. CARTWRIGHT
United States District Judge

Presented by:

CORR CRONIN LLP

s/ Blake Marks-Dias

Blake Marks-Dias, WSBA No. 2816

Victoria E. Ainsworth, WSBA No. 49677
1015 Second Avenue, Floor 10
Seattle, Washington 98104
(206) 625-8600 Phone
(206) 625-0900 Fax
bmarksdias@correronin.com
tainsworth@correronin.com

Cardelle Bratton Spangler, *Admitted Pro Hac Vice*
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
(312) 558-5600 Phone
(312) 558-5700 Fax
CSpangler@winston.com

STIPULATED MOTION TO EXTEND DEFENDANTS' DEADLINE TO FILE RESPONSIVE PLEADING
Page 3 - 3:23-cv-06150

Page 3 - 3:23-cv-06150

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 Whitney Williams, *Admitted Pro Hac Vice*)
2 WINSTON & STRAWN LLP
3 333 S. Grand Avenue, 38th Floor
4 Los Angeles, CA 90071-1543
(213) 615-1700 Phone
(213) 615-1750 Fax
5 WhWilliams@winston.com

6 *Attorneys for Defendants*

7 SHISHIDO TAREN GOLDSWORTHY

8 *s/ Jordan A. Taren (per email authorization)*
9 Jordan A. Taren, WSBA No. 50066
705 Second Avenue, Suite 1500
10 Seattle, WA 98104
(206) 622-1604 Phone
11 jtaren@shishidotaren.com

12 *s/ Linda D. Friedman (per email authorization)*
13 Linda D. Friedman ((Admitted PHV)
STOWELL & FRIEDMAN, LTD.
14 303 W. Madison Street, Suite 2600
Chicago, IL 60606
(312) 431-0888 Phone
(312) 431-0228 Fax
15 lfriedman@sfltd.com

16 *Attorneys for Plaintiff*

17
18
19
20
21
22
23
24
25
STIPULATED MOTION TO EXTEND DEFENDANTS'
DEADLINE TO FILE RESPONSIVE PLEADING
Page 4 - 3:23-cv-06150

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900